

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

X

DEREK KOFI JACKSON

Plaintiff

COMPLAINT

-against-

THE EDUCATION RESOURCES INSTITUTE,
BROOKLYN LAW SCHOOL AND SALLIE MAE

Defendant

X

The Plaintiff herein alleges the following:

1. That the Defendant the Education Resources Institute is a lender to which he owes \$48,000.00.
2. That the Defendant Brooklyn Law School is a law school to which he owes \$1,700.
3. That the Defendant Sallie Mae is a lender to which he owes \$71,518.76.
4. The Plaintiff is asking for the discharge of these debts by the Court due to the undue hardship it would cause him to pay the debts.
5. This undue hardship is owing to the fact that Plaintiff has had 8 psychiatric hospitalizations for bipolar disorder which have caused him to lose several jobs and have left him totally disabled and unable to work for long periods of time. During one such period Plaintiff subsisted on SSI for a lengthy period of time. Although Plaintiff is now working as a paralegal, his difficulties caused by his disability, as documented in the accompanying letter written by his physician, Dr. Joseph K. Youngerman, have left him only able to work at a level far below the career of attorney that he took out the student loans to study for. His illness is chronic and permanently disabling, as defined by the Americans with Disability Act.
6. Plaintiff's medical expenses and low earning potential make it an undue and uniquely burdensome hardship for him to repay the student loans.

Wherefore, Plaintiff prays that the Court grant him the much needed injunctive relief of discharging his student loan debt.

Derek Kofi Jackson

Derek Kofi Jackson
Pro Se Plaintiff
611 W 148 St. #66
New York, NY 10031

Form 16D. CAPTION FOR USE IN ADVERSARY PROCEEDING

United States Bankruptcy Court

_____ District Of _____
In re Sallie Mae, The
Educational Resources Institute
Brooklyn Law School
Derek K. Jackson Chapter X 7
Plaintiff
Sallie Mae, The
Education Resources
Institute
Brooklyn Law
School
Adv. Proc. No. _____

COMPLAINT [or other Designation]

[If in a Notice of Appeal (see Form 17) or other notice filed and served by a debtor, this caption must be altered to include the debtor's address and Employer's Tax Identification Number(s) or last four digits of Social Security Number(s) as in Form 16A.]

